



November 26, 2024

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VIA ECF & EMAIL

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Maritime Legal Solutions v. U.S. Transp. Command, No. 23 Civ. 7045 (KPF)*

Dear Judge Failla,

Our firm represents plaintiff Maritime Legal Solutions, PLLC ("MLS") in the above-referenced action under the Freedom of Information Act ("FOIA"). I write respectfully to request a sixty-day extension of the November 29, 2024 deadline for Plaintiff to file its papers in reply and in opposition to Defendant's cross-motion brief, to January 28, 2024. If the Court grants this relief, I also respectfully request a corresponding extension of the deadlines for Defendant's reply papers from December 20, 2024 to February 18, 2025.

This is the first request by Plaintiff for an extension for its papers in opposition to Defendant's cross-motion brief. Due to Defendant failing to produce a Vaughn Index and failing to produce records responsive to Plaintiff's FOIA Request that Defendant has acknowledged having within its possession, Defendant has made it impossible for Plaintiff to prepare its papers in this matter. Plaintiff requests this extension in order to give the government more time to produce its Vaughn Index and the responsive records.

I have conferred with opposing counsel on this matter and the government is not opposed to this motion.

Respectfully,

/s/ Ryan Melogy

J. Ryan Melogy, Esq.
Maritime Legal Solutions, PLLC

Cc: Joe Pantoja, Esq., *Attorney for Defendant* (by ECF)